

[WARNING: MESSAGE ENCRYPTED] Proposed Comments on Jan 1, 2021 Tech Standards Revisions

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 2 attachments (268 KB)

Summary of Proposed January 1, 2021 Technical Standards Revisions (8-19-20).pdf; C-1227.pdf;

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Jeff and Amanda,

I will be a bit late to today's meeting, so just wanted to share a summary of comments regarding the proposed tech standards changes received from CEHA members.

1. Section III Piping

- a. Section A Building Sewer. Add the words "prior to" following "provided" in the following sentence. "Stipulate that when a cleanout is provided for a multi-bend change in direction on a building sewer, it shall be provided prior to the first change in direction."
- b. Section D Drainage and Water Supply Piping: Provide a specification on the "solid carrier" sleeving pipe around the water suction pipe

2. Section V Design Flows:

- a. Subsection A General: ASTM C1227 does not indicate how lateral movement of a non-tapered tank cover is to be achieved (attached ASTM C 1227, Page 4, 7.6.5)

3. Section VIII Leaching Systems

- a. Figure 13-Minimum Separation Distances above Ledge Rock and Maximum Ground: Consider allowing a reduced amount of select fill on the upslope of a leaching system to allow said material to be added to the downslope (to prevent breakout, ie 2' upslope and 8' downslope)
- b. Subsection A-General: Will the new proposed 30" to groundwater (FEMA 100 year flood zone) and 24" to groundwater (FEMA 500 year flood zone) apply to inland, as well as coastal properties?
- c. Subsection A General: Several CEHA members have expressed concerns about eliminating or reducing the size of reserve areas. One reason to retain a reserve for new construction is that if the primary area is damaged prior to issuing a permit to discharge (which does happen) then the reserve area is still available to be used. Previous discussion with DPH EED have indicated that once a permit to discharge/CO is issued the reserve area is no longer needed. While it may not be required to prevent development of the reserve area after CO, said area of mostly undisturbed soils can be used for expansion or repair of the septic system in the future (with the understanding that the life of a home in CT can be a few hundred years but the life of a leaching system is only 30-50 years). Lastly the use of rejuvenating products on existing leaching systems is not always an option based on what, when and how the existing leaching system was installed.

4. Form 3 (Inspection Form)-Please add:

- a. the type of distribution pipe
- b. if MLSS was met

- c. If any variances are needed and type of variance
5. There was concerns by CEHA member about the Home Builders Association proposals.
 - a. Proposing third party plan review, inspections and approval of onsite septic systems by a PE for continuity, predictability and enhance the quality of the inspectors. While we understand that there is variability between the skills and knowledge of local health inspectors (which CEHA is looking to address with soils training, video and future hand-on training), the removal of review, inspection and approval of onsite septic systems from the local health authority, and placing it upon another entity, will not ensure continuity, predictability and/or quality of inspectors. Said individuals would also need to be trained, re-trained and checked for quality assurance to promote a quality inspector. Lastly, having a local health official involved in onsite septic systems is beneficial to understanding development and possible future groundwater contamination issues,
 - b. Reducing the design flow for homes based upon low flow fixture and other water saving issues. The design flow for residential buildings was already reduced to 75 gallons per bedroom for designs above 3 bedrooms.
 - c. Reducing property line setbacks to 5'. This will not allow for treatment of sewage on the property and will also be difficult to conduct grading for septic systems within the lot served.
 - d. Altering the bedroom definition to better align with State Building Code. There is a mixture of comments on this and it should be discussed further.

Thanks
Ryan

COVID-19 Land Use POLICY - Please read

For all scheduled Land Use activities (such as soils testing and inspections), CHD is limiting the number of persons for on-site work to no more than two other people (although one other person besides the inspecting sanitation is PREFERRED).

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